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April 17, 2020

Alexander Kadochnikov, Esq.
Shiryak, Bowman, Anderson, Gill & Kadochnikov LLP
80-02 Kew Gardens Road, Suite 600
Kew Gardens, NY 11415

Re: RSM Property Group, LLC
Your Client: Jagir Singh

Dear Mr. Kadochnikov:

My office represents Sukhinder Singh who owns 50% interest in RSM Property Group, LLC and his father Raghbir Singh. They have asked me to respond to your letter dated April 1, 2020.

Your letter demands production of books and records from December 18, 2015 pertaining to the property located at 9904 Glenwood Road, Brooklyn, NY 11236 ("Subject Property"). According to my client, the property was purchased in December 2016. Therefore, records for the subject property can only be produced from the purchase date.

My client uses the accounting services of Sandeep Grover. The records demanded in your letter are currently in possession of Mr. Grover. Due to the current crisis, Mr. Grover has not been work out of his office. He will to be able to produce the necessary records as soon as the restrictions end and he is able to return to his office.

It has also come to Raghbir Singh's attention that your client has been making defamatory statements regarding his character. My client is aware of at least two conversations in which your client has called Raghbir Singh a thief and a person of poor moral character. These conversations were had with Kulwinder Singh and Paramjit Singh who are willing to substantiate my client's allegations.

Mr. Raghbir Singh is a respected business man and is involved in many religious activities in the Sikh community in New York. He is considering filing a defamation of character suit against your should your client continue to make false allegations against him.

All records and documents in my clients' possession will be forwarded as soon as they are accessible.

Thank you for your attention in this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "K.S. Ahluwalia", with a stylized flourish at the end.

K. S. Ahluwalia

CC: Sukhjinder Singh, Raghbir Singh (via email)